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May 24, 2023

VIA ECF AND ELECTRONIC MAIL

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS-SAK

Dear Special Master Vanaskie:

This letter constitutes the parties' joint status report following our appearance before the Special Master on Wednesday, May 17. Plaintiffs' counsel has reviewed this letter and consents to its submission.

The parties held a meet-and-confer on Monday, May 22, 2023, to discuss Wholesaler Defendants' proposed discovery requests to Plaintiffs regarding information and documents about Plaintiffs' claim for unjust enrichment against Wholesaler Defendants. The parties have been unable to agree on most issues and therefore require a briefing schedule for submission of any disputes to your Honor. The parties jointly request that the Court enter the following schedule for submission of briefing on Wholesalers Defendants' proposed discovery requests:

June 13, 2023 – Wholesaler Defendants file their initial letter brief requiring Plaintiffs to respond to the subject discovery;

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Special Master the Honorable Thomas Vanaskie
May 24, 2023
Page 2

June 27, 2023 – Plaintiffs file their response/opposition to Wholesaler Defendants’
initial letter brief;

June 30, 2023 – Wholesaler Defendants file their reply brief, limited to 2 pages.

We appreciate your assistance in this matter.

Very truly yours,

/s/ Jeffrey D. Geoppinger

Jeffrey D. Geoppinger
Liaison Counsel for Wholesalers
Counsel for AmerisourceBergen Corporation

cc: All Counsel of Record (via ECF)